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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

Gramercy Distressed Opportunity Fund II, L.P.,  
Gramercy Distressed Opportunity Fund III,  
L.P., Gramercy Distressed Opportunity Fund  
III-A, L.P., Gramercy Funds Management LLC,  
Gramercy EM Credit Total Return Fund, and  
Roehampton Partners LLC,

Plaintiffs,

vs.

Oleg Bakhmatyuk, Nicholas Piazza, SP Capital  
Management, LLC, Oleksandr Yaremenko, and  
TNA Corporate Solutions, LLC,

Defendants.

Civil Action No. 0:21-cv-00223-NDF

Complaint Filed: December 7, 2021

Judge: Hon. Nancy D. Freudenthal

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**DEFENDANTS' RESPONSE TO PLAINTIFFS' REQUEST FOR ORAL ARGUMENT**

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Defendants Nicholas Piazza, SP Capital Management, LLC, Oleksandr Yaremenko, and TNA Corporate Solutions, LLC (the “Piazza Defendants”) respectfully respond to Plaintiffs’ Request for Oral Argument as follows:

The Piazza Defendants do not view this as the exceptional case that would require oral argument. The purely legal issues of a motion to dismiss will be fully addressed in the parties' submissions. Defendants believe the Court's usual practice of deciding motions to dismiss on the papers is appropriate here.

Dated: March 14, 2022.

/s/ Paula A. Fleck

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*Attorneys for Defendants Nicholas Piazza, SP Capital Management LLC, and TNA Corporate Solutions LLC, and Oleksandr Yaremenko*

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of March, 2022, I electronically transmitted the foregoing document to the Clerk of Court of the U.S. District Court, District of Wyoming, using the CM/ECF system for filing. Based on the records currently on file the Clerk of Court will transmit a Notice of Electronic Filing to all registered counsel of record.

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